

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

SUNG KOOK (BILL) HWANG and  
PATRICK HALLIGAN,

Defendants.

22 Cr. 240 (AKH)

DECLARATION OF JORDAN ESTES IN  
SUPPORT OF DEFENDANT SUNG KOOK  
(BILL) HWANG'S MOTION TO  
EXCLUDE EVIDENCE AND COMPEL  
DISCOVERY ON THE PROSECUTION'S  
RULE 16 VIOLATION

I, Jordan Estes, an attorney duly admitted to practice before this Court, hereby declare, pursuant to 28 U.S.C. § 1746 and under penalty of perjury, as follows:

1. I am a partner at the law firm of Kramer Levin Naftalis & Frankel LLP, counsel for Defendant Sung Kook (Bill) Hwang in the above-captioned matter.
2. I submit this Declaration to provide the Court with documents and information pertinent to Mr. Hwang's motion to exclude evidence and compel discovery on the prosecution's Rule 16 violation.
3. To the best of my knowledge, information, and belief, the exhibits to this Declaration are true and correct copies of the following documents.
4. Exhibit A is a copy of a search warrant for content and other information associated with various Bloomberg accounts, captioned 21 Mag. 9335.
5. Exhibit B is a copy of a November 23, 2021 letter from Steven Haber, on behalf of Bloomberg L.P., to the government. The letter was produced to the defense on January 5, 2024.
6. Exhibit C is a copy of an August 4, 2022 letter from the government to defense counsel Lawrence Lustberg and Mary Mulligan.

7. Exhibit D is a copy of an October 18, 2022 letter from defense counsel Lawrence Lustberg to the government.

8. Exhibit E is a copy of an October 24, 2022 email from the government to defense counsel Lawrence Lustberg, Thomas Valen, Mary Mulligan, and Timothy Haggerty.

9. Exhibit F is a copy of a November 15, 2022 letter from defense counsel Lawrence Lustberg to the government.

10. Exhibit G is a copy of a December 2, 2022 letter from the government to defense counsel.

11. Exhibit H is a copy of a December 22, 2022 email from defense counsel Lawrence Lustberg to the government.

12. Exhibit I is a copy of a January 13, 2023 email from defense counsel Lawrence Lustberg to the government. The email attached the December 22, 2022 email that is marked as Exhibit H.

13. Exhibit J is a copy of January 19, 2023 email from the government to defense counsel Lawrence Lustberg.

14. Exhibit K is a copy of contemporaneous notes from a February 28, 2023 telephone call between the government and defense counsel. The redacted portions of the notes are privileged.

15. Exhibit L is a copy of contemporaneous notes from a January 5, 2024 telephone call between the government and defense counsel.

16. Exhibit M is a copy of a January 5, 2024 letter from the government to defense counsel.

Dated: New York, New York  
January 8, 2024

/s/ Jordan Estes  
Jordan Estes